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7 UNITED STATES DISTRICT COURT FOR THE  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

NO. CR21-041 JCC

11 Plaintiff,

INFORMATION

12 v.

13 MUKUND MOHAN,

14 Defendant.

16 The United States Attorney and the Department of Justice charge that:

17  
18 **COUNT 1**  
19 (Wire Fraud)

20 Beginning in or about April 2020 and continuing until in or about June 2020, at  
21 Seattle, in the Western District of Washington and elsewhere, MUKUND MOHAN,  
22 knowingly devised and intended to devise a scheme and artifice to defraud financial  
23 institutions and the United States, and to obtain money and property by means of  
24 materially false and fraudulent pretenses, representations and promises.

25 *A. Manner and Means*

26 1. It was part of the scheme that MOHAN submitted fraudulent loan  
27 applications to financial institutions seeking millions of dollars in funds through the  
28 Paycheck Protection Program (“PPP”), on behalf of Zuput, Inc. (“Zuput”), Zigantic, LLC  
Information - 1  
United States v. Mukund Mohan, No. CR21-\_\_\_\_\_

UNITED STATES ATTORNEY  
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SEATTLE, WASHINGTON 98101  
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Inc. (“Expect Success”).

2. It was further part of the scheme that MOHAN submitted a fraudulent loan application to a financial institution, seeking approximately \$431,250 in funds through the PPP on behalf of Mahenjo, Inc. (“Mahanjo”).

3. In support of Mahenjo's fraudulent loan application, MOHAN made numerous false and misleading statements, including, but not limited to statements that:

- a. on February 15, 2020, Mahenjo was in operation and had employees for whom it paid salaries and payroll taxes or paid independent contractors;
- b. in 2019, Mahenjo's payroll expenses were more than \$2.3 million;
- c. Mahenjo's owner, MOHAN, was not the owner of any other business and did not manage any other business.

4. In further support of Mahenjo's fraudulent loan application, MOHAN submitted fake and altered documents, including fake federal tax filings, fake payroll reports, and altered incorporation documents.

5. It was further part of the scheme that the total amount of the eight loans for which Mohan applied was \$5,533,182, and that the total amount of PPP loan proceeds that Mohan received from the five PPP loans that were approved was \$1,786,357.

## *B. Execution*

6. On or about June 4, 2020, at Clyde Hill, in the Western District of Washington and elsewhere, MOHAN, for the purpose of executing the scheme described above transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, an interstate wire from the State of Washington to the State of California as part of the Fedwire transfer in the amount of \$431,250 from Peoples Bank’s bank account to Mahenjo’s JP Morgan Chase (“JPMC”) bank account.

All in violation of Title 18, United States Code, Section 1343.

**COUNT 2**  
**(Money Laundering)**

3 On or around May 26, 2020, at Clyde Hill, and elsewhere, in the Western District  
4 of Washington, MUKUND MOHAN did knowingly cause and engage in, and attempt to  
5 cause and engage in, a monetary transaction by, through, and to a financial institution,  
6 affecting interstate commerce, in criminally derived property of a value greater than  
7 \$10,000, that is, the transfer of \$50,000 from Zigantic's bank account at Azlo Business,  
8 Inc., with account number ending in 3419 to MUKUND MOHAN's personal brokerage  
9 account at Robinhood, with account number ending in 4609, such property having been  
10 derived from a specified unlawful activity, namely, Wire Fraud in violation of Title 18,  
11 United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1957(a).

## ASSET FORFEITURE ALLEGATIONS

15 All of the allegations contained in this Information are hereby realleged and  
16 incorporated by reference for the purpose of alleging forfeiture.

17       Upon conviction of the offense alleged in Count 1, the defendant MUKUND  
18 MOHAN shall forfeit to the United States, pursuant to Title 18, United States Code,  
19 Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), any  
20 property that constitutes or is traceable to proceeds of the offense. This property includes  
21 but is not limited to:

- a. \$4,500 in U.S. funds seized on July 23, 2020 from Azlo account ending in 0798, held in the name of Vangal, Inc.;
- b. \$73,262.38 in U.S. funds seized on July 23, 2020 from Azlo account ending in 3419, held in the name of Zigantic, LLC;
- c. \$129,295.46 in U.S. funds seized on July 30, 2020 from Bank of America account ending in 6319, held in the name of Zuput, Inc.;

- d. \$394,000 in U.S. funds seized on July 24, 2020 from Chase Bank account ending in 8877, held in the name of Expect Success, Inc.;
- e. \$431,250 in U.S. funds seized on July 24, 2020 from Chase Bank account ending in 9159, held in the name of Majenjo, Inc.;
- f. \$506,277 in U.S. funds seized on July 24, 2020 from Chase Bank account ending in 9773, held in the name of Gitgrow, Inc.;
- g. \$231,471 in U.S. funds seized on July 23, 2020 from Robinhood account ending in 4609, held in the name of Mukund Mohan; and,
- h. a sum of money in the amount of \$16,301.16, reflecting the unrecovered proceeds the defendant obtained from the offense.

Upon conviction of the offense alleged in Count 2, the defendant MUKUND MOHAN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property involved in the offense.

**Substitute Assets.** If any of the above-described forfeitable property, as a result of any act or omission of the relevant defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty;

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1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
3 21, United States Code, Section 853(p).

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5 DATED this 9<sup>th</sup> day of March, 2021.

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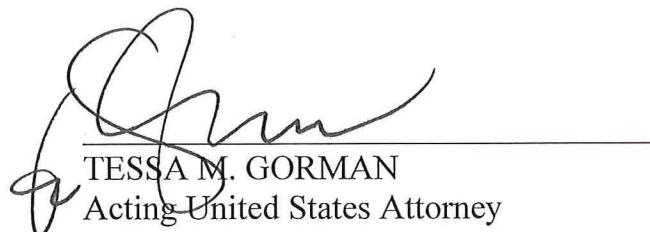
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TESSA M. GORMAN  
Acting United States Attorney



ANDREW C. FRIEDMAN  
Assistant United States Attorney

*s/Daniel S. Kahn*

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DANIEL S. KAHN  
Acting Chief  
Fraud Section, Criminal Division  
Department of Justice

*s/ Christopher Fenton*

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CHRISTOPHER FENTON  
Trial Attorney  
Fraud Section, Criminal Division  
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